



May 29, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: CG Docket No. 17-59 - Advanced Methods To Target and Eliminate
Unlawful Robocalls**

WC Docket No. 17-97 - Call Authentication Trust Anchor

Dear Ms. Dortch:

Representing the collective interests of Ohio's 264 credit unions and their more than three million members, the Ohio Credit Union League (OCUL) is responding to the Federal Communications Commission's (FCC) request for comment entitled Advanced Methods to Target and Eliminate Unlawful Robocalls under the Telephone Consumer Protection Act (TCPA) and Call Authentication Trust Anchor. OCUL applauds the FCC for its efforts to work with the various interested parties to combat the growing problem of illegal robocalling.

Ohio credit unions are financial cooperatives whose mission is to provide affordable, consumer-friendly products and timely, sensitive financial information to their members. Ohio credit unions serve a wide array of members: military service personnel and their families, state employees, religious groups, individuals and families of modest means, and students, among many other groups. As such, credit unions seek to communicate pertinent information to their members about fraud, theft, financial health, account services, and other financial items. Like the FCC, OCUL and its member credit unions see the harm that abusive and unwanted robocalls can cause. In fact, these unlawful robocalls interfere with legitimate, business communications between credit unions and their members.

As the FCC continues to explore the possibility of allowing voice service providers to block calls using call analytics that target unwanted calls, as long as their customers are informed and can opt out, and allow voice service providers to give customers the option to block calls from any number that does not appear on a customer's white list or contact list, OCUL urges the Commission to consider the unique credit union structure prior to its final rulemaking.





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Consideration of Pre-existing Relationships

Credit unions, as financial cooperatives, strive to provide affordable financial services to their members. As such, when Ohio credit unions are communicating with their members, the credit union is seeking to connect with the same people who own the credit union. Credit union members overwhelmingly expect and deserve timely communications regarding their accounts, specifically communications containing critical information, including fraud and account alerts and delinquent payment information. A significant percentage of the membership utilizes cell phones as their primary method of contact. It is imperative that credit unions have an unfettered ability to provide time sensitive information via cell phone calls and text messages. As such, OCUL encourages the FCC to consider pre-existing business relationships in its final ruling.

Opt-in/Opt-Out Clarification Needed

The proposed declaratory ruling could not only potentially endanger consumers' financial well-being, but also safe and sound credit union practices. Under the current proposal, neither the credit union nor credit union members will know when calls are blocked. Currently, consumers can opt-in to call blocking services. The FCC intends to reverse this practice and allow consumers to opt-out. Part of the justification for the ruling is consumers were unaware of the right to opt-in and so few did; however, if consumers did not have enough information to know their right to opt-in, it is unlikely they will have enough information to know their right to opt-out.

OCUL is concerned that consumers will have insufficient information regarding the consequences of blocking all calls except those on their personal white list or contacts list. For example, members who applied for loans and need to be called by loan officers may not have those loan officers' numbers stored in their phones. This would effectively block credit union calls from reaching members that have opted-in. It could also complicate credit unions' collection efforts, which could delay borrowers getting critical information and subjecting them to adverse credit reporting.

Conflicting Federal Regulatory Guidance

OCUL remains concerned the FCC's ruling conflicts with the Consumer Financial Protection Bureau, National Credit Union Administration, and other financial regulator guidance on how to utilize modern communication methods to provide time-sensitive account information to members. The ruling will further erode credit unions' ability to relay critical information or implement consumer protections regarding fraud, privacy, and account activity. The lack of consistency between federal regulators has put Ohio credit unions in a position of having to choose between which federal agency's regulations will take precedent or risk liability. This ultimately diminishes effective communication between a credit union and its members and exposes credit unions to an increase in costly litigation.



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While OCUL supports the FCC's efforts to reduce illegal robocalls, we have significant concerns that the action the FCC intends to take is overly broad and could have a significant adverse impact on credit unions' and other financial service providers' ability to communicate with their members and customers. As such, OCUL respectfully recommends the FCC take more time to consider various stakeholder concerns.

Thank you for your careful consideration and for the opportunity to express these views to the FCC. Should you have any questions regarding our comments, please feel free to contact us at 1-800-486-2917.

Sincerely,

Paul L. Mercer
President

Emily C. Leite
VP, Advocacy



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